

1 Zoya Kovalenko (State Bar No. 338624)  
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4 *Attorney for Plaintiff Zoya Kovalenko*

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11 ZOYA KOVALENKO,

12 Plaintiff,

13 v.

14 KIRKLAND & ELLIS LLP, MICHAEL DE  
VRIES, MICHAEL W. DE VRIES, P.C.,  
15 ADAM ALPER, ADAM R. ALPER, P.C.,  
AKSHAY DEORAS, AKSHAY S. DEORAS,  
16 P.C., AND MARK FAHEY,

17 Defendants.  
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Case No. 4:22-cv-05990-HSG (TSH)

**DECLARATION OF ZOYA  
KOVALENKO IN SUPPORT OF JOINT  
ADMINISTRATIVE MOTION TO  
PERMIT NON-PUBLIC DISCUSSIONS  
DURING THE APRIL 18, 2025  
DISCOVERY HEARING**

Re: Dkt. No. 215

Assigned to the Honorable Haywood S.  
Gilliam, Jr., United States District Judge for  
the United States District Court for the  
Northern District of California, Oakland  
Division

Referred to the Honorable Thomas S. Hixson,  
United States Magistrate Judge for the United  
States District Court for the Northern District  
of California, San Francisco Division

Telephonic discovery hearing scheduled for  
April 18, 2025, at 10:00 am, before Judge  
Hixson, at the San Francisco Courthouse, 15th  
Floor, Courtroom E, 450 Golden Gate Avenue,  
San Francisco, California 94102

1 I, Zoya Kovalenko, hereby declare as follows:

2 1. I am the plaintiff (“Plaintiff”) in this action, *Kovalenko v. Kirkland & Ellis LLP*,  
3 No. 4:22-cv-05990-HSG (TSH) (N.D. Cal.). I am an attorney and am licensed to practice in the  
4 state of California. My California State Bar Number is 338624. I am admitted to practice before  
5 this Court. I represent myself in this action.

6 2. I submit this declaration in support of the parties’ Joint Administrative Motion to  
7 Permit Non-Public Discussions During the April 18, 2025 Discovery Hearing (the “Joint Motion”).  
8 I am familiar with the facts and circumstances of this litigation. I know the facts set forth in this  
9 declaration to be true of my own personal knowledge. If called as a witness, I could and would  
10 testify competently to the matters set forth in this declaration.

11 3. The upcoming discovery hearing on April 18, 2025 concerns a subpoena I served  
12 on counsel for defendant Kirkland & Ellis LLP (“K&E”). The narrow subpoena requests from  
13 K&E certain financial information.

14 4. The parties have an established interest in maintaining confidentiality over  
15 discussions involving the subpoena and the background of the issue.

16 5. If the Court does not allow for *in camera* discussion, it will be very difficult to  
17 directly discuss the pending subpoena dispute. As a result, I believe that not permitting the relief  
18 requested is likely to compromise the integrity of the hearing.

19 6. There are additional reasons that support this Motion that I can provide to the Court  
20 non-publicly.

21 I declare under penalty of perjury under the laws of the United States of America that the  
22 foregoing is true and correct. Executed on April 17, 2025, in Germantown, Maryland.

23 s/Zoya Kovalenko

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*Plaintiff Zoya Kovalenko and Attorney for Plaintiff Zoya Kovalenko*